

ALEX G. TSE (CABN 152348)
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Attorneys for Defendant
David J. Shulkin, M.D.
Secretary of the Department of Veterans Affairs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VICTORIA TSIPARSKY,)	CASE NO. 3:17-CV-3021 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXTENDING CASE SCHEDULE
v.)	
)	
DAVID J. SHULKIN, M.D., SECRETARY OF)	
THE DEPARTMENT OF VETERANS)	
AFFAIRS,)	
)	
Defendant.)	

The parties to the above-entitled action jointly request that the schedule for this case be extended as described herein.

After the initial case management conference in this case, the Court issued a scheduling order on December 7, 2017 that included, among other things, a reference to a Magistrate Judge for a settlement conference “to take place, ideally, within the next 90 days.” Counsel for the parties had a conference call with Magistrate Judge Westmore on January 11, 2018. At that time, plaintiff’s counsel advised that he had very recently learned that plaintiff had been hospitalized. Accordingly, a decision on a date for a settlement conference was deferred. Plaintiff’s counsel has advised that plaintiff has now recovered sufficiently to be able to participate in discovery and settlement efforts. Plaintiff’s counsel contacted

Judge Westmore's chambers and was advised that the earliest she could accommodate a settlement conference would be in June.

Accordingly, in order to allow a reasonable amount of time for discovery and settlement efforts, the parties propose the following changes to the existing case schedule.

Event	Current Date	Proposed Date
Fact discovery cutoff	April 13, 2018	June 15, 2018
Settlement Conference deadline	March 7, 2018	July 13, 2018
Last day dispositive motion hearing	June 28, 2018	August 30, 2018
Expert disclosures with reports	August 31, 2018	October 19, 2018
Rebuttal expert disclosures and reports	September 28, 2018	November 16, 2018
Expert discovery cutoff	November 2, 2018	December 20, 2018
Final pretrial conference (10:00 a.m.)	November 29, 2018	January 31, 2019
Trial (9:00 a.m.)	December 10, 2018	February 11, 2019

Respectfully submitted,

Dated: February 27, 2018

ALEX G. TSE
ACTING UNITED STATES ATTORNEY

/s/

By: _____
CLAIRE T. CORMIER¹
Assistant U.S. Attorney

Dated: February 27, 2018

/s/

By: _____
FRANK P. SARRO
Attorney for Plaintiff

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties and good cause appearing, IT IS SO ORDERED.

Dated: 2/28, 2018


RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

¹ I, Claire T. Cormier, hereby attest that I have been authorized to submit the electronic signatures indicated by a "conformed" signature (/s/) within this e-filed document.